



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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Dirk Kempthorne, Governor
C. Stephen Allred, Director

April 4, 2002

Mr. Frederick P. Hughes
General Manager
BNFL Inc.
Suite 207
1970 East 17th Street
Idaho Falls, ID 83404

Mr. Dave Wessman
Environmental Compliance Manager
Idaho Operations Office
Department of Energy
850 Energy Drive
Idaho Falls, ID 83401-1563

SUBJECT: Comments on the Closure Plan for the Transuranic Storage Area (TSA) Interim Status Units (Pads 1, 2, and R) Located at the Radioactive Waste Management Complex on the INEEL (EPA ID Nos. ID4890008952)

Dear Mr. Hughes and Mr. Wessman:

The Department of Environmental Quality (DEQ) has received the Closure Plan for the TSA Pads 1, 2, and R that was submitted to partially satisfy Permit Condition II.K of the Advanced Mixed Waste Treatment Project Partial Hazardous Waste Management Act Permit.

The plan satisfies the IDAPA 58.01.05.009 [40 CFR §265.112(a)] requirement that the TSA Units have a written closure plan. This plan must be provided upon a request of the Director, and be available on-site for a same-day review by duly authorized DEQ personnel.

Although the plan is not subject to Department approval at this time (see IDAPA 58.01.05.009 [40 CFR §265.112(d)(2)]), DEQ has identified the following concerns that may necessitate revision of the closure plan:

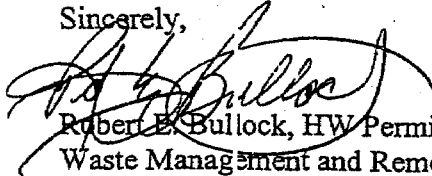
1. The closure plan assumes either the ability to clean close or that any releases will be addressed by the Federal Facilities Agreement/Consent Order (FFA/CO). DEQ believes that BNFL Inc. must implement some form of contingency plan whenever a release is encountered during the retrieval operations. If the contingency plan response cannot satisfactorily remediate the release, the location

and nature of any residual contamination must be documented in the operating record. BNFL Inc. must then determine if the release constitutes an unusual occurrence, under IDAPA 58.01.05.009 [40 CFR §265.112(c)(1)(iv)], and respond appropriately.

2. The closure plan assumes that the three pads will be closed simultaneously. Since each pad is a separate interim status unit, this assumption may not be valid.
3. The maximum inventory for each pad must be individually identified in the event the three pads are not closed at the same time.

If you have any questions concerning the AMWTF Permit, please contact Mr. Brian English at (208) 373-0425.

Sincerely,



Robert E. Bullock, HW Permit Coordinator
Waste Management and Remediation Division

REBABLE:ls RwmclLetters\2002\usa closure letter

cc: Jeff Hunt, EPA Region 10
Kathleen Trever, INEEL Oversight
Rensay Owen, Idaho Falls R.O.
INpbvmf
COF